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ARNOLD SCHWARZENEGGER
Governor

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Wireless Telecommunications Bureau and) WP Docket No. 10-54
Public Safety and Homeland Security Bureau)
Seek Comment on Request by American)
Hospital Association for Blanket Waiver to)
Permit Hospitals to Use Amateur Radio as Part)
of Emergency Preparedness Drills)

To: The Commission

COMMENTS

In response to the Public Notice in the captioned proceeding, the California Department of Public Health (CDPH) hereby submits comments in support of the American Hospital Association's (AHA) request for a blanket waiver of Section 97.113(a)(3) of the Commission's rules to permit hospitals to utilize Amateur Radio operations as part of emergency preparedness drills.

California currently has over 450 licensed general acute care hospitals. The state faces many threats, including earthquakes, floods, tsunamis, wildfires, pandemics, as well as nuclear/chemical/biological emergencies. These threats can cause local or regional interruption of primary communication methods, requiring facilities to revert to redundant communication methods.

It is essential that hospitals be prepared to respond to disasters and California requires hospitals to have an emergency plan as part of their licensure requirements. A critical component of emergency preparedness is redundant communication; a key redundant method is amateur radio. It has already proved itself during other large scale disasters, particularly Hurricane Katrina. Communications outages

similar to Katrina are anticipated in a large-scale earthquake. Drills and exercises are a critical component to adequately prepare for future incidents. While hospitals may currently have radio equipment, it is essential that designated hospital employees who are licensed radio operators participate in drills and exercises to become familiar with the equipment to be used during a response.

Amateur radio is an important tool for redundant communication between health care facilities and state and local government. For this purpose, CDPH maintains amateur radio stations at its emergency operations centers in Sacramento and Richmond, California. Other public safety agencies, including the Emergency Medical Services Authority (EMSA) and the California Emergency Management Agency (Cal EMA), also maintain amateur radio stations.

Approval of this waiver will enhance the abilities of hospitals to prepare for and respond to disasters and other incidents in which normal means of communications are rendered inoperable. Since amateur radio is a redundant communication method available during disasters, it is critical to allow operators to conduct radio drills and exercises to ensure the transmission of potentially life-saving information during an incident.

Respectfully submitted,



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